

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RONDA DANNER, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

**LEADING HEALTHCARE
SOLUTIONS, INC.,**

Defendants.

Civil Case No.: 2:22-cv-11498

HON. STEPHEN J. MURPHY, III

**JOINT MOTION TO EXTEND DEADLINE TO FILE CLOSING
DOCUMENTS DISMISSING THE CASE WITH PREJUDICE**

Plaintiff Ronda Danner and Defendant Leading Healthcare Solutions, Inc. (“LHS”) hereby jointly move this Court for an Order extending the deadline to file their closing documents. In support of this Motion, the parties state as follows:

1. On September 26, 2023, the Parties filed a Notice of Resolution notifying the court that the parties had reached an agreement in principle to resolve this matter. *See* ECF No. 47.
2. On September 28, 2023, the Court issued its Order Dismissing Case Without Prejudice. ECF No. 48.
3. The Court instructed the parties to file closing documents dismissing the case with prejudice no later than October 26, 2023. *Id.*

4. The Court also stated it would retain jurisdiction to resolve any disputes over settlement matters, including reopening the case if the settlement ultimately fails. *Id.*

5. The nature of the settlement agreement requires the parties to finalize actions by October 25, 2024.

6. After the final actions have been taken, the parties will submit a joint stipulation of dismissal.

7. The parties request that the court retain jurisdiction pending completion of the settlement terms.

8. The parties request that the Court administratively close the case but allow the parties until October 31, 2024 for the parties to reinstate the case should the settlement terms not be completed.

9. A proposed Order accompanies this Motion.

Dated: October 25, 2023

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